



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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TO: Transporters of Hazardous Waste Licensed by the
Commonwealth of Massachusetts

FROM: Steven A. DeGabriele, Director, Business Compliance Division

DATE: January 6, 2003

RE: Use of Temporary Hazardous Waste Generator Identification Numbers

The Department of Environmental Protection (DEP) has found that some generators are listing temporary identification numbers (ID) in Item 1 of manifests when permanent IDs should, in fact, have been used. I am writing to ask for your help in ensuring that your clients use their permanent IDs and avoid violating DEP's hazardous waste management rules.

Massachusetts hazardous waste regulations – found at 310 CMR 30.061(1), 30.253(9)(a)(b) and 30.353(5) – require anyone who routinely generates hazardous waste and/or waste oil to register with DEP or notify the agency of their activity, and to obtain a permanent ID.

Large Quantity (LQG) or Small Quantity (SQG) generators of hazardous waste and/or LQGs of waste oil are required to apply for and obtain permanent IDs as soon as possible. Generators may use self-assigned temporary IDs for hazardous waste and waste oil shipments only until DEP issues permanent state/ U.S. Environmental Protection Agency (EPA) IDs to them. Once permanent IDs have been issued, they must be listed in Item 1 of every hazardous waste manifest.

Very Small Quantity (VSQG) or Small Quantity (SQG) generators of waste oil should never use temporary IDs. They are required to self-assign permanent IDs and may use them immediately upon registering with DEP. Transporters may want to have the registration form on hand for clients to use when needed.

We have prepared a fact sheet that you may distribute to your clients, to explain who must assign themselves an ID. The fact sheet also provides instructions for self-assigning temporary IDs. The fact sheet is available from DEP's web site, at <http://www.state.ma.us/dep/bwp/dhm/dhmpubs.htm#fact>. Generators of hazardous waste and/or waste oil must use the correct ID on all manifests submitted to DEP, as described in 310 CMR

This information is available in alternate format. Call April McCabe, ADA Coordinator at 1-617-556-1171. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

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30.303(10), 30.311(1) and 30.314(1). By signing Item 16 of a manifest, the generator is certifying that the ID listed in Item 1 is valid at the time of the shipment.

Transporters of hazardous waste and waste oil are required by 310 CMR 30.403(1) to ensure that they collect waste only from generators who hold valid DEP or EPA IDs. Transporters who fail to comply with this requirement may be subject to enforcement action, including financial penalties. Generators misusing IDs are also subject to enforcement action.

You may assist clients in completing the generator portion of manifests. We advise you to require your clients who are LQGs or SQGs of hazardous waste and/or LQGs of waste oil and currently using temporary IDs to provide proof that they have applied for a permanent ID. If you or an employee completes Item 1 of these forms, you must ensure that the listed IDs are current and valid.

If you have questions about this memorandum or the enclosed fact sheet or you wish to verify a permanent generator ID, please contact David Biggers at (617) 292-5787.